

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	x	
	:	
UNITED STATES OF AMERICA	:	
	:	
- v -	:	2! Cr. 268 (LTS)
	:	
YENNY SANTOS-REYNOSO,	:	
	:	
Defendant.	:	
-----	x	

PLEASE TAKE NOTICE, that based on the accompanying memorandum of law and the declaration attached thereto, the defendant herein, Yenny Santos-Reynoso, will move this Court, before the Honorable Laura Taylor Swain, Chief United States District Judge for the Southern District of New York, at a time to be set by the Court, for an Order dismissing the indictment as it was obtained in violation of the Equal Protection Guarantee of the Fifth Amendment, and because the immigration judge who purported to order Ms. Santos-Reynoso's removal *in absentia* lacked jurisdiction to do so.

DATED: New York, New York
April 8, 2022

DAVID PATTON, ESQ.
Federal Defenders of New York, Inc.
Attorney for Defendant
YENNY SANTOS-REYNOSO
52 Duane Street - 10th Floor
New York, New York 10007
Tel.: (212) 417-8737

MARTIN S. COHEN
Of Counsel

TO: DAMIAN WILLIAMS, ESQ.
United States Attorney
Southern District of New York
One. St. Andrew's Plaza
New York, New York 10007
Attn: KEVIN MEAD, ESQ.
Assistant United States Attorney